

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LeClairRyan, PLLC,¹

Debtor

Case No. 19-34574-KRH

Chapter 7

**PROPOSED AGENDA FOR HEARING ON
AUGUST 19, 2021, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on August 19, 2021, beginning at 11:00 a.m. via Zoom:

Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJltcuyurT4uGUza77r1a7XmQbZhJCVxE1M>

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 81921

I. MATTERS IN THE MAIN CASE

1. Motion for Relief from Stay Re: Insurance Policy filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. (Attachments: # 1 Exhibit(s) A # 2 Proposed Order) (Saitta, Rebecca) [ECF No. 857]

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

Paula S. Beran, Esquire (Va. Bar No. 34679)
Tavener & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel for Lynn L. Tavener, Chapter 7 Trustee

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. Hearing scheduled for 6/24/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # [1](#) Exhibit(s) A)(Saitta, Rebecca) [ECF No. 859]
- b. Hearing held; final hearing set; Declaration of Lynn Tavenner #[924](#) Admitted. Appearance(s): Paula Beran for Trustee; Rebecca Saitta for Columbia Casualty Company (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) Hearing scheduled for 7/22/2021 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 927]
- c. Exhibit (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. (Saitta, Rebecca) [ECF No. 951]
- d. Hearing held and continued; Declaration of Lynn Tavenner [949](#) Admitted. Appearance(s): Paula Beran for Trustee; Rebecca Saitta for Columbia Casualty Company (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 954]
- e. Stipulation *Granting Relief From Automatic Stay* By Columbia Casualty Company and Between Trustee (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) filed by Rebecca L. Saitta of Wiley Rein LLP on behalf of Columbia Casualty Company. (Attachments: # [1](#) Exhibit(s) A)(Saitta, Rebecca) [ECF No. 965]

Response Deadline: June 17, 2021

Responses Filed:

Objection to - *TRUSTEES ANSWER AND LIMITED OBJECTION TO THE MOTION FOR RELIEF FROM THE AUTOMATIC STAY* (Re: related document(s)[857](#) Motion for Relief from Stay filed by Columbia Casualty Company) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 921]

Status: The Trustee and Movant have agreed on the form of a proposed order (as found at ECF No. 965) that allows the Motion to be granted under modified terms.

2. Motion to Approve - *TRUSTEES SECOND MOTION TO MODIFY PROCEDURES REGARDING THE PROSECUTION AND/OR SETTLEMENT OF ACTIONS INVOLVING FORMER ATTORNEYS AND CERTAIN OTHERS AND MEMORANDUM IN SUPPORT THEREOF* filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 962]

Related documents:

- a. Motion to Approve (*Trustee's Motion for an Order Establishing Procedures Regarding the Prosecution of Actions Involving Former Attorneys and Certain Others and Memorandum in Support Thereof*) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 457]
- b. Notice of Motion and Notice of Hearing (Re: related document(s)[962](#) Motion to Approve filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 963]

Response Deadline: August 16, 2021

Responses Filed: Objection to *Trustee's Second Motion to Modify Procedures Regarding the Prosecution and/or Settlement of Actions Involving Former Attorneys and Certain Others* (Re: related document(s)[962](#) Motion to Approve filed by Lynn L. Tavenner) filed by Paul A. Driscoll of Zemanian Law Group on behalf of Lisa M. Murphy. (Attachments: # [1](#) Exhibit(s) Letter electing mediation # [2](#) Exhibit(s) E-mail acknowledging mediation election) (Driscoll, Paul) [ECF No. 967]

Filed on behalf of former attorney - Objection to (Re: related document(s)[962](#) Motion to Approve filed by Lynn L. Tavenner) filed by Andrew M. Bowman of Gentry Locke on behalf of Former Attorney. (Attachments: # [1](#) Exhibit(s) A (Redacted) # [2](#) Exhibit(s) B (Redacted) # [3](#) Exhibit(s) C (Redacted) # [4](#) Exhibit(s) D (Redacted)) (Bowman, Andrew) [ECF No. 968]

Filed on behalf of former attorney - Motion to File Document(s) Under Seal (Related Document(s)[968](#) Objection to Motion/Application filed by Former Attorney) filed by Andrew M. Bowman of Gentry Locke on behalf of Former Attorney. (Attachments: # [1](#) Exhibit(s) A) (Bowman, Andrew) [ECF No. 969]

Filed on behalf of former attorney - Notice of Motion and Notice of Hearing (Re: related document(s)[969](#) Motion to File Documents(s) Under Seal filed by Former Attorney) filed by Andrew M. Bowman of Gentry Locke on behalf of Former Attorney. Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bowman, Andrew) [ECF No. 970]

Filed on behalf of former attorney - Sealed Objection (Related Document(s)[968](#) Objection to Motion/Application filed by Former Attorney) filed by Andrew M. Bowman of Gentry Locke on behalf of Former Attorney. (Attachments: # [1](#) Exhibit(s) A # [2](#) Exhibit(s) B # [3](#) Exhibit(s) C # [4](#) Exhibit(s) D) (Bowman, Andrew) [ECF No. 971]

Status: The Trustee will request that this Court invoke an express provision of the FAO Order and authorize the modification of certain discrete aspects of the FAO Actions Procedures (all as defined in the Second Motion To Modify Procedures).

3. Motion to Authorize *Disclosure of Certain Settlement Materials* filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner. (Morabito, Erika) [ECF No. 944] and Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) [ECF No. 55]

Related documents:

- a. Notice of Motion (Re: related document(s)[944](#) Motion to Authorize filed by Lynn L. Tavenner) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner. (Morabito, Erika) [ECF No. 945] [ECF No. 56]
- b. Hearing held and continued; Declaration of Lynn Tavenner 949 Admitted. Appearance(s):): Erika Morabito for Trustee; Thomas McKee for ULX Partners, LLC (Re: related document(s)[944](#) Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens'

Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Gary, Lisa) [ECF No. 953]

Response Deadline: July 19, 2021

Responses Filed: None

Status: The Trustee will request that the Court enter an Order granting the Motion as modified.

II. MATTERS IN ADVERSARY PROCEEDINGS

4. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Motion to File Document(s) Under Seal (Re: related document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 68]

Related documents:

- a. Motion to Amend *Complaint and to Modify Pretrial Scheduling Order* (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 66]
- b. Notice of Motion and Notice of Hearing (Re: related document(s)[68](#) Motion to File Documents(s) Under Seal filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Morabito, Erika) [ECF No. 69]
- c. Sealed Motion/Application (Related Document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, [68](#) Motion to File Documents(s) Under Seal filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 70]
- d. Sealed Motion/Application(Re: related document(s)[70](#) Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, [73](#) Motion to Amend filed by Lynn L.

Tavener, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 74]

Response Deadline: August 16, 2021

Responses Filed: None

Status: The Trustee will ask the Court to enter an Order authorizing her to file under seal certain portions of the Motion for Leave to Amend Complaint and to Modify Pretrial Scheduling Order, as well as to file under seal in its entirety the proposed amended complaint.

5. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) – Motion to Amend Complaint and to Modify Pretrial Scheduling Order (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 66]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Morabito, Erika) [ECF No. 67]
- b. Sealed Motion/Application (Related Document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, [68](#) Motion to File Documents(s) Under Seal filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 70]
- c. Corrected Motion to Amend *Complaint and to Modify Pretrial Scheduling Order* (Re: related document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 73]

- e. Sealed Motion/Application(Re: related document(s)[70](#) Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, [73](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit(s)) (Morabito, Erika) [ECF No. 74]

Response Deadline: August 16, 2021

Objection to (Re: related document(s)[66](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. (McKee, Thomas) [EF No. 75]

Motion to File Document(s) Under Seal (Re: related document(s)[75](#) Objection to Motion/Application filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#) Proposed Order) (McKee, Thomas) [ECF No. 76]

Responses Filed:

Notice of Hearing (Re: related document(s)[76](#) Motion to File Documents(s) Under Seal filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 8/19/2021 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 77]

Sealed Objection (Re: related document(s)[75](#) Objection to Motion/Application filed by ULX Partners, LLC, UnitedLex Corporation) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Partners, LLC, UnitedLex Corporation. (McKee, Thomas) [ECF No. 78]

Status:

The Trustee will ask the Court to grant the Motion to Amend Complaint and to Modify Pretrial Scheduling Order and enter an Order (i) granting the Trustee leave to file an amended complaint and (ii) amend the Second Pretrial Order as appropriate.

IV. REPORTS

6. Case Status and Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: August 17, 2021
Richmond, Virginia

By: /s/ Paula S. Beran
Paula S. Beran, Esquire (VSB No. 34679)
PBeran@TB-LawFirm.com
Tavenner & Beran, PLC
20 North 8th Street
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopier: (804) 783-0178

Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 17th day of August 2021, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran
Counsel for Lynn L. Tavenner, Chapter 7 Trustee